

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )

v. )

BENY GARNEATA, )  
DUMITRU CURESCU, )  
LAVINIA CURESCU, )  
TEOFIL SCORTE, )  
WILLIAM WELLHAUSEN, )  
VASILE FOFIU and )  
MARIO OLIVELLA )

**0 8CR 398**

No. \_\_\_\_\_  
Magistrate Judge Martin C. Ashman

**FILED**

**MAY 20 2008 TC**

**MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT**

**EX PARTE MOTION TO SEAL CRIMINAL  
COMPLAINT, AFFIDAVIT AND ARREST WARRANTS**


The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, moves to seal the contents of the above criminal complaint, affidavit in support of the criminal complaint and arrest warrants. In support of its Motion, the government states as follows:

1. The United States has presented the Court with a criminal complaint, an affidavit supporting the criminal complaint and arrest warrants for the defendants.
2. The complaint, affidavit and warrants contain information concerning a sensitive investigation and identify the targets of the investigation.
3. If the contents of the complaint, affidavit and warrant are made public prior to the arrest of the defendants, the defendants may take action to impede any further investigation and may also interfere with their arrests.

WHEREFORE, the United States respectfully requests this Court to enter an Order placing the complaint, affidavit, arrest warrant and this Motion under seal for until and including November 20, 2008 or until the time that any of the defendant is arrested, or until further order of this Court.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By:   
JULIET S. SORENSEN  
CHRISTINA EGAN  
Assistants United States Attorney  
219 South Dearborn, Third Floor  
Chicago, Illinois 60604  
312/ 353-5300